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November 1, 2022

Via ECF

The Honorable Colleen McMahon
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Terrence Turner*
22-CR-82-CM

Dear Honorable Judge McMahon,

I am writing to request a modification of Terrence Turner's bail conditions. Mr. Turner is currently released on home incarceration and is allowed out of his home to come to my office, court, and medical appointments. Mr. Turner has secured employment as a porter at the Holiday Market at Union Square. Mr. Turner is scheduled to begin working at the Holiday Market, where he will work for Urbanspace NYC, on Tuesday, November 8 at 8:00am. Mr. Turner's hours will vary, but will be between the hours of 8:00am and 8:00pm. A letter from Urbanspace NYC is attached to this letter as Exhibit 1, confirming this employment. I am, therefore, asking the Court to change Mr. Turner's bail conditions from home incarceration to home detention, to enable him to work.

I have consulted with Pretrial Services, prior to making this request of the Court. Pretrial Services Officer Francesca Piperato has informed me that pretrial services has no objections to amending the conditions of Mr. Turner's release to home detention, in lieu of home incarceration. The Government defers to Pretrial Services.

Sincerely,

/s/

GARY M. KAUFMAN, ESQ.
Attorney for Terrence Turner

cc: AUSAs Ashley Nicolas, Andrew Rohrbach, and Alexander Li
Pretrial Services Officer Francesca Piperato

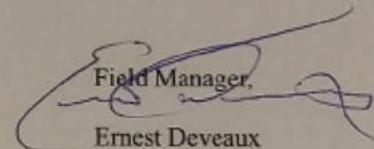
EXHIBIT 1



10/28/2022

To whom it may concern,

I am writing this letter in regards to Terrance Turner employment. He will be a Porter at the Holiday Market located in Union Square . The market is being run by Urbanspace NYC, his start date for the job is November 8,2022 at 8 a.m. On this day he will be assisting myself and other staff members with building various things needed for the project. We officially will be open to the public November 17,2022. Below are the dates and hours the market will be run. If you have any questions or concerns please feel free to contact me at [REDACTED]


Field Manager,
Ernest Deveaux

MARKET DATES & HOURS

November 17 - December 24, 2022

Mon - Fri 11am - 8pm

Sat 10am - 8pm

Sun 11am - 7pm

Closed Thanksgivings Day, Nov 24

4pm Closing Christmas Eve, Dec 24

Open Rain or Shine

AMENITIES

Parking

Accessible

